



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JAN 29 2014

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL 7009 1680 0000 7663 6346
RETURN RECEIPT REQUESTED

Mr. James Melville
Vice President
Chippewa Brass and Aluminum Foundry
1350 Halbleib Road
Chippewa Falls, Wisconsin 54729

Re: Notice of Violation
EPA ID No: WID988592242

Dear Mr. Melville:

On November 21, 2013, representatives of the U.S. Environmental Protection Agency and Wisconsin Department of Natural Resources inspected the Chippewa Brass and Aluminum Foundry ("Chippewa Brass" or "Facility") located in Chippewa, Wisconsin. The purpose of the inspection was to evaluate Chippewa Brass' compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6901 *et seq.*--specifically, regulations related to the generation, treatment, and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by Chippewa Brass personnel during the inspection, EPA finds that Chippewa Brass was operating a hazardous waste storage facility without a hazardous waste license. Chippewa Brass was also in violation of certain additional requirements of the Wisconsin Administrative Code (WAC) and of the U.S. Code of Federal Regulations (CFR).

Chippewa Brass does not qualify for the hazardous waste license exemption

Chippewa Brass did not meet all of the conditions for a hazardous waste license exemption as outlined in WAC s. NR 662 Subchapter S [40 CFR §§ 262.34(c) and (d)]. Some of these conditions are also requirements of owners and operators of hazardous waste treatment, storage, and disposal facilities (TSDFs). The conditions with which Chippewa Brass did not comply are as follows:

1. In order to qualify for a hazardous waste operating license exemption, a small quantity generator of hazardous waste must conduct weekly inspections of the hazardous waste storage area. WAC s. NR 662.192(1)(b); 665.0174 [40 CFR §§ 262.34(d)(2); 265.174]. This container management condition is also a requirement of owners and operators of TSDFs under WAC s. NR 665.0174 [40 CFR § 265.174].

At the time of the inspection, Mr. Melville stated that weekly inspections were not being conducted in the 180-day storage area. Therefore, Chippewa Brass failed to comply with the above-mentioned condition for a hazardous waste operating license exemption and violated the TSDF container management requirement.

2. In order to qualify for a hazardous waste operating license exemption, a small quantity generator of hazardous waste must place the waste in either containers or tanks. When using containers, the generator must comply with the requirements of subchapter I of WAC NR 665 [40 CFR part 265, subpart I] except for ss. NR 665.0176 and 665.0178 [§§ 265.176 and 265.178].

At the time of the inspection, Chippewa Brass was storing hazardous waste sand in a pile on the Facility floor prior to treatment. This pile was not contained. Chippewa Brass, therefore, failed to comply with the above-mentioned condition for a hazardous waste operating license exemption and violated the TSDF container management requirements.

3. According to WAC s. NR 662.192(4)(a) [40 CFR § 262.34(c)(1)], a generator that complies with container management requirements in WAC ss. NR 665.0171, 665.0172, and 665.0173(1) [40 CFR §§ 265.171, 265.172, and 265.173(a)] and that marks its containers either with the words "Hazardous Waste" or with other words that identify the contents of the container, may accumulate as much as 55 gallons of hazardous waste in containers in satellite areas at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a license or interim status and without having to comply with WAC s. NR 662.034(1) [40 CFR § 262.34(a)]. Please note that WAC s. NR 665.0173(1) [40 CFR § 265.173(a)] states that a container holding hazardous waste must be closed during storage, except when it is necessary to add or remove waste. This container management condition for a license exemption is also a requirement of owners and operators of TSDFs under WAC s. NR 665.0173(1) [40 CFR § 265.173(a)].

At the time of the inspection, Chippewa Brass was accumulating waste sand and metal in a 55-gallon drum beneath a deburring machine called a "wheelabrator." The drum was neither closed nor labeled. Chippewa Brass therefore failed to comply with the above-mentioned conditions for a hazardous waste operating license exemption and violated the TSDF container management requirement.

Note: Mr. Melville of Chippewa Brass stated in an email dated from 12/16/13, that the above violation had been corrected. No further action is requested for this violation.

4. In order to qualify for a hazardous waste operating license exemption a small quantity generator of hazardous waste must post next to the telephone, among other things, a phone number for the fire department and the location of fire extinguishers and spill control material, and, if present, fire alarm. WAC s. NR 662.192(1)(e)2.b. and c. [40 CFR § 262.34(d)(5)(ii)(B) and (C)].

At the time of the inspection, the phone number for the fire department and the locations of the above-mentioned emergency equipment were not posted near the telephone. Chippewa Brass, therefore, failed to comply with the above-mentioned condition for a hazardous waste operating license.

Note: Mr. Melville of Chippewa Brass stated in an email dated from 12/16/13, that the above violations had been corrected. No further action is requested for this violation.

Chippewa Brass operated a hazardous waste TSDF without an operating license

5. A small quantity generator accumulating hazardous waste on-site for fewer than 180 days and who does not meet the conditions for a license exemption under WAC s. NR 662.192 [40 CFR § 262.34], as outlined in violations 1 through 4 above, is an operator of a hazardous waste storage facility and is required to obtain a Wisconsin hazardous waste storage license.

Chippewa Brass' failure to apply for and to obtain a Wisconsin hazardous waste storage license, as required by failing to meet exemption conditions described in the violations above, violated the licensing requirements of WAC ss. NR 670.001(3), 670.010(1), (4) and 670.013 [40 CFR §§ 270.1(c), 270.10(a), (d) and 270.13].

Chippewa Brass violated land disposal restriction and universal waste requirements

6. With the initial shipment of waste to each treatment, storage, or disposal facility, the generator must send a one-time written notice to each treatment storage, or disposal facility receiving the waste, and place a copy in the file. WAC ss. NR 668.07(1)(e)3.; 668.07(1)(c)1. [40 CFR §§ 268.7(a)(5)(iii); 40 CFR 268.7(a)(3)(i)].

At the time of the inspection, a copy of the land disposal restriction notice for foundry sand that is treated to meet land disposal restriction requirements was not on file at the facility. Therefore, Chippewa Brass violated the above-mentioned land disposal restriction requirements.

7. Certain wastes may be managed under universal waste standards as an alternative to full regulation as hazardous wastes. Among other requirements, a small quantity handler of universal waste must label a used mercury containing thermostat, or the container in which it is held, with the phrase "Universal Waste – Mercury Thermostat," "Waste Mercury Thermostat," or "Used Mercury Thermostat." WAC s. NR 673.14(4) [40 CFR § 273.14(d)].

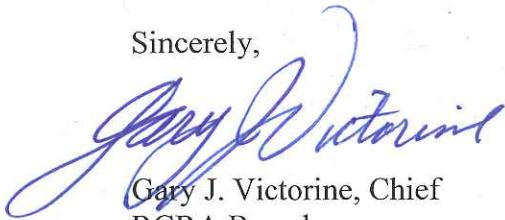
At the time of the inspection, Mr. Melville stated that they had one mercury thermostat in storage and that the device was not labeled. Chippewa Brass, therefore, violated the above-mentioned universal waste requirement.

EPA's request for Chippewa Brass

At this time, EPA is not requiring Chippewa Brass to apply for a hazardous waste license so long as it immediately establishes compliance with the conditions for a license exemption as outlined above. Please note that Chippewa Brass' compliance with the conditions described above will not relieve it of its liability for the violations identified in this letter. Under Section 3008(a) RCRA, 42 U.S.C. § 6928(a), EPA reserves the right to bring further enforcement actions, including an order for civil penalties, against Chippewa Brass for the violations identified in this letter. Although this letter is not such an order, we request that you submit a response in writing to this office no later than 30 days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to establish compliance with all of the above conditions and requirements

You should submit your response to Brenda Whitney, United States Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604. If you have any questions regarding this letter, please contact Ms. Whitney at (312) 353-4796.

Sincerely,



Gary J. Victorine, Chief
RCRA Branch

Enclosures

cc: Troy Gansluckner, WDNR (Troy.Gansluckner@Wisconsin.gov)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

Compliance Evaluation Inspection Report

Date of Inspection: November 21, 2013

Facility Name: Chippewa Brass and Aluminum Foundry

Facility Address: 1350 Halbleib Road
Chippewa Falls, Wisconsin 54729

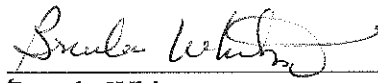
EPA RCRA ID Number: WID988592242

Generator Status: Small Quantity Generator

Facility Contact: James Melville
Vice President

U.S. EPA Inspector: Brenda Whitney
Environmental Engineer
Compliance Section 2
Resource Conservation and Recovery Act (RCRA) Branch

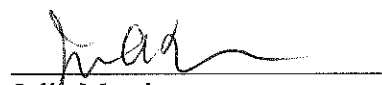
Prepared By:


Brenda Whitney
Environmental Engineer

Date Completed:

12 / 18 / 2013
Month / Day / Year

Accepted By:


Julie Morris
Chief, Compliance Section 2
RCRA Branch

Date Accepted:

12/23/13
Month / Day / Year

Introduction

I conducted an unannounced Compliance Evaluation Inspection (CEI) of the Chippewa Brass and Aluminum Foundry (“Chippewa Brass” or “Facility”) located at 1350 Halbleib Road in Chippewa Falls, Wisconsin, on November 21, 2013. This CEI was an evaluation of Chippewa Brass’s compliance with the RCRA hazardous waste regulations codified in the Wisconsin Administrative Code and in the Code of Federal Regulations. Chippewa Brass was operating as a small quantity generator at the time of the inspection. Troy Gansluckner of the Wisconsin Department of Natural Resources (WDNR) accompanied me on this inspection. The following people were present for part or all of this inspection:

James Melville – Vice President	Chippewa Brass
Nicole Melville – Administrative Manager	Chippewa Brass
Troy Gansluckner – Environmental Specialist	WDNR
Brenda Whitney – Environmental Engineer	EPA

Introduction

I displayed official credentials to Facility personnel upon arrival at Chippewa Brass. The purpose and logistics of the CEI were delineated, and we discussed Chippewa Brass’ hazardous waste generation sources and treatment methods. I informed Mr. Melville that I would be taking photographs during the CEI as needed. I provided three informational handouts to Mr. Melville: *SHWEC Environmental Programs (WDNR brochure)*; *P2 Technical Assistance Contacts*; and *U.S. EPA Small Business Resources*.

Site Description

The following information about Chippewa Brass is based on the personal observations of the EPA inspector and on representations made during the inspection by the Facility personnel identified above or within the text unless otherwise noted.

According to the Chippewa Brass website, Chippewa Brass began operations in 1953 supplying a local fire truck manufacturer with metal castings. Currently, Chippewa Brass makes non-ferrous, heavy industrial castings for the agricultural, fire-fighting, marine, and shipping industries as well as for the military. Smaller jobs include custom parts for cars and tractors as well as brass or aluminum plaques. The raw metals used at this facility include different grades of brass (leaded and non-leaded) as well as aluminum. The facility is 14,000 ft² in size.

The process of casting at Chippewa Brass involves loose molding with green olivine sand. The parts supplied by the customers are used as patterns in a pressed sand mold. The sand is left loose and maintains shape through pressure only. For components that are hollow, such as pipes, the center of the cast can be made with a sand core that is bound with a chemical substance in an “air-set” process that solidifies the sand. These cores are typically used in non-leaded brass or

aluminum applications. Molten metal is poured into the molds by hand. When the casting has cooled, the mold is knocked off the part. The cast component is deburred, and after a finishing inspection, is prepared for shipment.

Wastes are generated at different stages of the process. The molds are first sprayed with a pattern spray that is an ignitable material with a flash point around 40°F. This material has not been sent off-site for disposal; it has always been used to completion. After casting, much of the olivine sand can be reused. For that which cannot be reused, the lead-contaminated sand is treated in drums on-site according to a waste analysis plan and is disposed of off-site as non-hazardous waste in a solid waste landfill. The sand is treated with a chemical named "EnviroBlend." A pre-determined amount is added to a known weight of used sand in the drum, which is then placed in a drum roller for a specified amount of time. The mixed material is then stored in drums in the facility until the landfill delivers an empty roll-off box, which occurs once a year. The material is emptied from the containers into the roll-off, which is then transported to the landfill.

Other wastes generated at the facility include slag and zinc dust. These materials are sold to a metal recycler for lead content. The sand used in non-leaded air-set applications has been analyzed for metal content and is discarded as non-hazardous waste. Used oil and universal waste lamps and batteries are managed through a contractor and are not stored on-site.

Site Tour

The site tour began by the raw materials and induction furnaces where the metal ingots are melted down in graphite crucibles. The olivine sand molding process is also in this area. The air-set area is somewhat segregated from the rest of the facility. No hazardous waste was observed in any of these areas.

In the rear of the facility, is the deburring mechanism called a wheelabrator. A 55-gallon drum was situated under this equipment to collect the waste sand and metal (Appendix A: Photograph 1). This drum was not labeled with the words "Hazardous Waste" or with any other words describing its contents. The knock-off area was near the wheelabrator. The waste collects in a pile on the floor of the facility until a known quantity has accumulated (See Appendix A: Photograph 2). This pile was not contained. Positioned around the pile were several drums of slag and dust that were to be sold for metal content. Mr. Melville did not have any knowledge of the end-use of the zinc dust and was not aware of whether the material was to be used in a fertilizer.

In the corner of the facility were several drums of treated olivine sand that were awaiting disposal. The containers may be stored up to a year in this area as disposal occurs approximately once per year.

End of tour.

Records and Emergency Preparedness Review

Emergency Posting: A list of emergency contacts was located near the phone in the front office. The list did not include a phone number for the fire department or a list of locations for emergency equipment in the facility.

Emergency and Hazardous Waste Awareness: Employees in the facility are familiarized with emergency procedures and have been made aware of the hazards associated with the waste generation and treatment processes at the facility.

Manifests: Hazardous waste manifests are no longer used at this facility. All of the waste transported off-site has been either treated to meet LDRs or is non-hazardous. Non-Hazardous Waste Shipment Manifests are used in combination with Special Waste Profile sheets, which the landfill requires. A land disposal restriction form was not available for review for the treated waste.

Waste Determinations: Waste determinations have been made for the wastes generated at this facility, with the exception of a used mercury switch. Mr. Melville had not yet determined if the switch will be managed as a universal waste or as a hazardous waste.

Weekly Inspections: Weekly inspections are not conducted or recorded at this facility.

Closing Conference

The following items were discussed with Chippewa Brass personnel at the close of the inspection:

- Containerizing hazardous waste prior to treatment
- Satellite accumulation requirements
- Emergency list
- Weekly inspections
- Mercury switch management.
- No information collected during the inspection was deemed to be Confidential Business Information.

Appendices

Appendix A: Photograph Log

Appendix B: Checklists

Appendix C: Post-Inspection email and attachments from Chippewa Brass dated 12/16/2013

Appendix A

Photograph Log

Inspection Date:

November 21, 2013

Facility Name and ID Number:

Chippewa Brass and Aluminum
Foundry

EPA ID: WID988592242

Inspector and Photographer:

Brenda Whitney

Compliance Section 2

RCRA Branch

Land and Chemicals Division

Camera Used:

Nikon Cool Pix P4 VR

Serial Number: 30530701



Photograph 1 – A 55-gallon drum was positioned under a wheelabrator. The drum was not closed or labeled. The container was not being filled or emptied at the time of the inspection.



Photograph 2 – The knock out area for the used olivine sand and cores was in a pile on the floor of the facility. The pile was not contained. The containers in the background were to be sold for scrap metal.

Appendix B

Checklists

Inspection Date:

November 21, 2013

Facility Name and ID Number:

Chippewa Brass and Aluminum

Foundry

WID988592242

Inspector:

Brenda Whitney

Compliance Section 2

RCRA Branch

Land and Chemicals Division



SMALL QUANTITY GENERATOR INSPECTION

CHIPPewa BASs 2
ALUMINUM FOUNDRY

Revision: 10/31/2011
WASTE & MATERIALS
MANAGEMENT PROGRAM

This Inspection Form, used for the inspection of facilities that generate between 100 kg (220 lbs) and 1000 kg (2205 lbs) of non acute hazardous waste in a calendar month and less than 1 kg of acute hazardous waste in a calendar month, evaluates facility compliance with Wisconsin's Hazardous Waste Management Rules (chapter NR 660 - 679, Wis. Admin. Code).

Section 1: Waste Information

A. Hazardous waste determination has been made on each solid waste generated (NR 662.011).	Y	662.190(2) Photo <input type="checkbox"/>
B. The waste determination has been made correctly, considering the listed waste definitions and the characteristics of the waste, in light of the materials or processes used (NR 662.011(3)).	Y	662.190(2) Photo <input type="checkbox"/>
C. Waste samples are analyzed by laboratories certified or registered under NR 149. Provide lab names and certification numbers (NR 662.011(3)(a)1). <i>- DAVIS LAB - Analyze treated waste to meet LORS</i>	Y Y	662.190(2) Photo <input type="checkbox"/>
D. Generator keeps records of all waste determinations on-site for at least three years from the date the waste was last sent to a storage, treatment or disposal facility.	Y	662.193(1)(b) Photo <input type="checkbox"/>
E. Generator submitted a notification form and obtained an EPA ID# (NR 662.012). Note: A subsequent notification should be submitted when there is an ownership or name change.	Y	662.190(2) Photo <input type="checkbox"/>

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

Use Non-Hazardous Waste Shipping Manifest

A. Generator sends waste off-site to be reclaimed under a contractual agreement. If NO, go to Question 2.E.	N	 Photo <input type="checkbox"/>
B. Type of waste and frequency of shipments are specified in the contractual agreement.	N/A	662.191(1)(a) Photo <input type="checkbox"/>
C. Vehicle used to transport the waste to the recycler and back to the generator is owned and operated by the reclaimer.	N/A	662.191(1)(b) Photo <input type="checkbox"/>
D. Copy of the reclamation agreement is maintained for at least 3 years from the date the agreement is terminated or expires.	N/A	662.191(2) Photo <input type="checkbox"/>
E. Generator sends hazardous waste off-site that is not reclaimed under a contractual agreement. If NO, go to Question 2.K.	N	 Photo <input type="checkbox"/>
F. The manifest is used according to the instructions in the appendix to 40 CFR part 262 (NR 662.020(1)).	N/A	662.190(2)(a) Photo <input type="checkbox"/>
G. The facility designated on the manifest is permitted or licensed to accept the waste (NR 662.020(2)).	N/A	662.190(2)(a) Photo <input type="checkbox"/>
H. For out-of-state shipments, a copy of the manifest is sent to the department within 30 days of receiving the signed copy from the designated facility (NR 662.023(3)).	N/A	662.190(2)(a) Photo <input type="checkbox"/>
I. Manifest continuation form, EPA form 8700-22A, is prepared according to the instructions in the appendix of 40 CFR part 262 (NR 662.020(1)).	N/A	662.190(2)(a) Photo <input type="checkbox"/>
J. If the generator received a shipment back as a rejected load, the returned waste has been accumulated in compliance with the container or tank standards for less than 180 days.	N/A	662.192(5) Photo <input type="checkbox"/>



SMALL QUANTITY GENERATOR INSPECTION

Revision: 10/31/2011
WASTE & MATERIALS
MANAGEMENT PROGRAM

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

K. Upon receipt of the rejected shipment, the generator signed EITHER of the following: 1. Manifest Item 18c if the transporter returned the shipment using the original manifest. 2. Manifest Item 20 if the transporter returned the shipment using a new manifest.	N/A	662.192(5) Photo <input type="checkbox"/>
L. Copy of the manifest is signed by the generator and retained until the signed copy from the designated facility is received.	N/A	662.193(1)(a) Photo <input type="checkbox"/>
M. Copy of each manifest is kept for at least three years from the date of shipment.	N/A	662.193(1)(a) Photo <input type="checkbox"/>
N. Hazardous waste is packaged according to applicable DOT requirements before transport (NR 662.030).	N/A	662.190.(2) Photo <input type="checkbox"/>
O. Hazardous waste is labeled according to applicable DOT requirements before transport (NR 662.031).	N/A	662.190(2) Photo <input type="checkbox"/>
P. Hazardous waste is marked according to applicable DOT requirements before transport (NR 662.032(1)).	N/A	662.190(2) Photo <input type="checkbox"/>
Q. Containers of 119 gallons and less are marked with the "Hazardous Waste - Federal law prohibit improper disposal" label before transport (NR 662.032(2)).	N/A	662.190(2) Photo <input type="checkbox"/>
R. Placards are offered to the initial transporter (NR 662.033).	N/A	662.190(2) Photo <input type="checkbox"/>

Section 3: Land Disposal Restrictions

A. Generator determined if each waste is prohibited from land disposal by lab analysis or generator knowledge.	Y	668.07(1) Photo <input type="checkbox"/>
B. Generator complies with the prohibition against dilution of wastes.	Y	668.03 Photo <input type="checkbox"/>
C. A one-time written notice is sent to each treatment, storage or disposal facility with the initial waste shipment.	N	668.07(1) Photo <input type="checkbox"/>
D. A new notification is sent to the TSD and maintained in the generator file when the waste or receiving facility changes.	N/A	668.07(1) Photo <input type="checkbox"/>
E. If the waste MEETS treatment standards, the LDR notice certifies the wastes may be land disposed without further treatment.	N	668.07(1) Photo <input type="checkbox"/>
F. If the waste EXCEEDS treatment standards, the LDR notice notifies of appropriate treatment and applicable prohibitions.	N/A	668.07(1) Photo <input type="checkbox"/>
G. Copy of the LDR notifications and certifications are retained for at least 3 years from the date the waste was last sent off-site.	N	668.07(1)(h) Photo <input type="checkbox"/>



SMALL QUANTITY GENERATOR INSPECTION

Revision: 10/31/2011
WASTE & MATERIALS
MANAGEMENT PROGRAM

Section 3: Land Disposal Restrictions

H. Generator with a contractual agreement complies with BOTH of the following: 1. The notification and certification requirements for the initial shipment of the waste subject to the agreement. 2. Retains a copy of the notification and certification with the tolling agreement for at least 3 years after the agreement is terminated or expires.	N/A	668.07(1)(j) Photo <input type="checkbox"/>
I. Underlying hazardous constituents have been identified for characteristic wastes.	N/A	668.09(1) Photo <input type="checkbox"/>
J. Generator identifies EITHER of the following when the waste is both a listed and characteristic waste: 1. The treatment standards for the listed waste code, in lieu of the treatment standard for the characteristic waste code. 2. The treatment standards for all applicable listed and characteristic waste codes.	Y	668.09(2) Photo <input type="checkbox"/>
K. If waste is treated in containers or tanks, the generator meets with BOTH of the following (NR 668.07(1)(e)): 1. Developed a waste analysis plan describing the procedures used to meet applicable LDR treatment standards. 2. Complies with the certification requirements in NR 668.07(1)(c). ← NOT SENT TO TSD	N	662.192(1)(d) Photo <input type="checkbox"/>

Section 4: Annual Reports and Exception Reporting

A. Annual reports covering generator activities during the previous calendar year have been submitted to the Department by March 1 of the following year.	Y	662.193(3) Photo <input type="checkbox"/>
B. Copy of each annual report is kept for at least 3 years from the due date of the report.	Y	662.193(1)(c) Photo <input type="checkbox"/>
C. If the signed manifest copy is not received in 60 days, a legible copy of the manifest indicating no confirmation of delivery was submitted to the department.	N/A	662.193(2) Photo <input type="checkbox"/>

Section 5: Preparedness and Prevention

A. Generator has ALL of the following equipment, unless the equipment is not necessary for the types of wastes handled (665.0032): 1. Device to summon emergency assistance (e.g., telephone, 2 way radio). 2. Internal communications and alarm systems. NO 3. Portable fire extinguishers. 4. Fire control equipment, including special extinguishing equipment. 5. Spill control equipment. 6. Decontamination equipment (e.g., eyewash, shower). 7. Water at adequate volume and pressure to supply water spray systems. NO SPRINKLERS - MORTON METAL	Y	662.192(1)(d) Photo <input type="checkbox"/>
B. All of the above emergency equipment is tested and maintained to assure its proper operation in an emergency (665.0033). FIRE INSPECTOR 2x/year	Y	662.192(1)(d) Photo <input type="checkbox"/>
C. There is immediate access to internal or external alarms or an emergency communication device in hazardous waste handling areas (665.0034). phone in the office only	NO	662.192(1)(d) Photo <input type="checkbox"/>



SMALL QUANTITY GENERATOR INSPECTION

Revision: 10/31/2011
WASTE & MATERIALS
MANAGEMENT PROGRAM

Section 5: Preparedness and Prevention

D. Generator has made ALL of the following arrangements with emergency organizations (NR 665.0037(1)):

1. Primary and support roles have been defined if multiple police and fire departments could respond to an emergency.
2. Police, fire and emergency response teams are familiar with the site layout, hazards of the waste handled, places where personnel work, entrances and roads in the site and possible evacuation routes.
3. Agreements are made with emergency response contractors and equipment suppliers. NO
4. Local hospitals are familiar with the properties of wastes handled and the potential resulting injuries or illnesses. DR. NOTIFIED - BLOOD TESTING

E. Aisle space is provided throughout the facility to allow for the unobstructed movement of personnel and all emergency equipment (NR 665.0035).

Y	662.192(1)(d)
	Photo <input type="checkbox"/>
Y	662.192(1)(d)
	Photo <input type="checkbox"/>

Section 6: Emergency Procedures & Personnel Training Requirements

A. A person has been identified as an emergency coordinator who is responsible for coordinating all emergency response measures and is on the premises or able to reach the site within a short period of time.

B. ALL of the following information is posted next to the telephone:

1. Name and telephone number of the emergency coordinator.
2. Location of fire extinguishers, spill control material and, if present, fire alarm. NO
3. Telephone number of the fire department unless the generator has a direct alarm. NO

C. In the event of an emergency, the emergency coordinator takes the following actions:

1. In the event of a release, telephone the division of emergency management (800-943-0003) and comply with NR 706.
2. In the event of a fire, call the fire department or attempt to extinguish the fire, if appropriate.
3. In the event of a spill, contain the flow of hazardous waste to the extent possible and clean up the hazardous waste and contaminated materials or soil.
4. If there is a release that could threaten human health outside the facility or if a spill reaches surface water, immediately notify the national response center (800-424-8802).

D. All employees are thoroughly familiar with proper waste handling and emergency procedures relevant to their responsibilities during normal operations and emergencies.

Y	662.192(1)(e)1
	Photo <input type="checkbox"/>
N	662.192(1)(e)2
	Photo <input type="checkbox"/>
N/A	662.192(1)(e)4
	Photo <input type="checkbox"/>
X	662.192(1)(e)3
	Photo <input type="checkbox"/>

GO OVER LEAD TRAINING AND WTP

Section 7: Container Accumulation

A. Generator accumulates hazardous waste in containers. If NO, go to Section 8.

Waste on floor

NO	
	Photo <input type="checkbox"/>

B. The accumulation start date is clearly marked and visible for inspection on each container.

N/A	662.192(1)(d)1
	Photo <input type="checkbox"/>

C. All containers are clearly marked with the words "Hazardous Waste".

N/A	662.192(1)(d)2
	Photo <input type="checkbox"/>

D. The contents of a container that is leaking or in poor condition are transferred to another container in good condition (NR 665.0171).

N/A	662.192(1)(b)
	Photo <input type="checkbox"/>



SMALL QUANTITY GENERATOR INSPECTION

Revision: 10/31/2011
WASTE & MATERIALS
MANAGEMENT PROGRAM

Section 7: Container Accumulation

E. Containers are made or lined with materials compatible with the waste (NR 665.0172).	N/A	662.192(1)(b) Photo <input type="checkbox"/>
F. Containers are kept closed except when it is necessary to add or remove waste (NR 665.0173(1)).	N/A	662.192(1)(b) Photo <input type="checkbox"/>
G. Containers are opened, handled or stored to prevent leaks or ruptures (NR 665.0173(2)).	N/A	662.192(1)(b) Photo <input type="checkbox"/>
H. Container storage areas are inspected weekly for leaks and deterioration (NR 665.0174).	N/A	662.192(1)(b) Photo <input type="checkbox"/>
I. Incompatible wastes are stored in separate containers unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(1)).	N/A	662.192(1)(b) Photo <input type="checkbox"/>
J. Containers of incompatible wastes are separated or protected from each other by a physical barrier (dike, berm, wall or other device) (NR 665.0177(3)).	N/A	662.192(1)(b) Photo <input type="checkbox"/>
K. Containers that previously held waste are properly washed before adding incompatible waste, unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(2)).	N/A	662.192(1)(b) Photo <input type="checkbox"/>

Section 8: Satellite Accumulation

A. Waste is accumulated in satellite accumulation areas. If NO, go to Section 9.	<div>Y</div> <div>N/A</div>	Photo <input type="checkbox"/>
B. Generator accumulates no more than 55 gallons of hazardous waste or 1 quart of acute hazardous waste in each satellite area.	Y	662.192(4)(a) Photo <input type="checkbox"/>
C. Satellite containers are under the control of the operator of the process generating the waste.	Y	662.192(4)(a) Photo <input type="checkbox"/>
D. Containers are always kept closed except when it is necessary to add or remove waste (NR 665.0173(1)).	N	662.192(4)(a)1 Photo <input type="checkbox"/>
E. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).	Y	662.192(4)(a)1 Photo <input type="checkbox"/>
F. Containers are marked "Hazardous Waste" or with other words that identify the contents.	N	662.192(4)(a)2 Photo <input type="checkbox"/>
G. If the container is leaking or in poor condition, contents are transferred to another container in good condition (NR 665.0171).	N/A	662.192(4)(a)1 Photo <input type="checkbox"/>
H. Container holding the excess waste is marked with the date the excess amount begins accumulating.	N/A	662.192(4)(b) Photo <input type="checkbox"/>



SMALL QUANTITY GENERATOR INSPECTION

Revision: 10/31/2011
WASTE & MATERIALS
MANAGEMENT PROGRAM

Section 8: Satellite Accumulation

I. Generator complies with the 180 day accumulation requirements with respect to the excess amount within 3 days of it being generated.

Y

662.192(4)(b)

Photo ☐

Section 9: Used Oil

A. Used oil is managed on-site. If NO, go to Section 10.

NO

Photo ☐

B. Used oil containing $\geq 1,000$ ppm halogens is managed as listed hazardous waste or the rebuttable presumption requirements have been met.

N/A

679.10(2)(a)2

Photo ☐

C. Used oil containers and tanks are in good condition and not leaking.

N/A

679.22(2)

Photo ☐

D. Used oil containers and tanks are marked "used oil".

N/A

679.22(3)(a)

Photo ☐

E. Transporter has an EPA ID number, except when generator self-transport or has a tolling agreement.

N/A

679.24

Photo ☐

F. Used automotive oil filters and oil absorbent material are not land filled, except if less than 1 gallon absorbent results from a non-routine spill.

N/A

Photo ☐

G. If used oil is burned in an on-site used oil-fired space heater, all of the following are met:

1. Only used oil from the generator or household do-it-yourselfers is burned.
2. The heater is designed with a maximum capacity of 0.5 million BTU per hour or less.
3. The combustion gases are vented to the ambient air.

N/A

679.23

Photo ☐

H. If used oil is accepted from others or sent off-site to be burned in a space heater, the used oil meets fuel specifications and the marketer requirements in NR 679 subch. H are met.

N/A

679.11

Photo ☐

Section 10: Waste Minimization Certification

A. Small quantity generator has made a good faith effort to minimize the amount of waste generated (NR 662.027(2)).

Y

662.190(2)(a)

Photo ☐

Section 11: Generator Status Evaluation

A. Between 220 lbs (100 kg) and 2,205 lbs (1,000 kg) of waste is generated in any month.

Y

662.190(1)

Photo ☐

B. Waste is accumulated for 180 days or less.

Y

662.192(1)

Photo ☐

C. Waste is accumulated for 270 days or less if the generator must ship 200 miles or more.

NA

662.192(2)

Photo ☐



SMALL QUANTITY GENERATOR INSPECTION

Revision: 10/31/2011
WASTE & MATERIALS
MANAGEMENT PROGRAM

Section 11: Generator Status Evaluation

D. Less than 13,230 lbs (6,000 kg) of waste is accumulated.

4

662.192(1)(a)

Photo ☐

E. Describe any other activities the generator is conducting at the facility.

Photo ☐

Appendix C

Email correspondence
including attachments
from James Melville of
Chippewa Brass and
Aluminum Foundry

December 16, 2013

Whitney, Brenda

From: Whitney, Brenda
Sent: Monday, December 16, 2013 3:02 PM
To: 'cbf@chippewafoundry.com'
Cc: 'Gansluckner, Troy A - DNR'
Subject: RE: November 21, 2013 Inspection

Hi James,

Thank you for your email. I will be sure to add all of the information to the file.

I just wanted to let you know that the regulation for the LDR certification statement is found at 40 CFR 268.7(a)(3)(i). You get to this regulation by first going to 40 CFR 268.7(a)(5), then reading down to 40 CFR 268.7(a)(5)(iii), which takes you over to 40 CFR 268.7(a)(3)(i).

40 CFR 268.7(a)(3)(i) states, "With the initial shipment of waste to each treatment, storage, or disposal facility, the generator must sent a one-time written notice to each treatment storage, or disposal facility receiving the waste, and place a copy in the file."

This regulation is what I was referring to during the inspection. Putting the certification in the WAP does not appear to satisfy this requirement.

Also, to answer your question about placing the waste on the ground, I have talked to Jill at WDNR as well as with Michael Beedle here at EPA (both of these inspectors have been to your facility in the past) and both agreed that the waste must be placed in a container immediately after generation. And, as you said, the containers need to be managed as hazardous waste containers.

Do you remember who it was who told you to place the waste directly on the ground? If you have that information, please let me know.

Thanks again for your email.

Brenda

Brenda Whitney
Environmental Engineer
U.S. EPA - Region 5
77 W. Jackson Boulevard, LR-8J
Chicago, Illinois 60604
312-353-4796 (ph)
312-385-5505 (fax)

From: cbf@chippewafoundry.com [<mailto:cbf@chippewafoundry.com>]
Sent: Monday, December 16, 2013 1:57 PM
To: Whitney, Brenda
Subject: November 21, 2013 Inspection

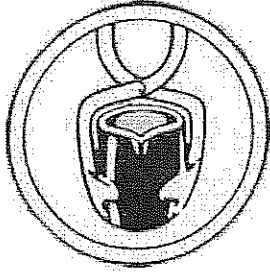
Hi Brenda,

I talked to Troy about the inspection and the following things. The paper that you ask for with the paragraph from "Hazardous Waste Land Disposal Restrictions" That states: I certify under penalty of law that I personally have examined and I am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the treatment standards specified in s. NR 668.40 [ir 40CFR 268.40] without impermissible dilution of the prohibited waste. I am aware there are significant penalties for submitting a false certification, including the imprisonment. I have had this in our WAP. Jill Showen had me put that in there from the beginning. I have included the updated one in the attachments. We have also retained WWR for waste spill cleanup. I have also attached a copy of the contract. Another thing you wanted us to have is a map with the fire extinguishers Emergency show and Eye wash. I have since made one a also have attached that also. I have a telephone on order for in our production area. I am working on labeling for the hazardous waste barrels, for now we do have the one labeled hazardous waste sand, but working on a removable one for after treatment.

The other thing I wanted to discuss is the waste sand on the floor. Like I had said when you were here, we were told we could not put it in the drums until just before treatment. You said you were going to look into this. We would prefer if we could put it directly into barrels. This would help us out in many ways. It would eliminate shoveling it off the floor, we could potentially separate out the core butts and riser sleeves and if after we get them tested could dispose of them in regular solid waste stream, this would also make it so we could put a dust collector at the drum and reduce lead exposure to our employees. I do understand if we put the sand directly into drums they will have to be labeled "HAZARDOUS WASTE" along with the date when we start filling the drums and can't exceed 180 days from the start.

Please let me know on the waste sand being put directly into drum, so we can move forward on this project.

Thanks,
James Melville
Chippewa Brass & Aluminum Foundry LTD.



Chippewa Brass & Aluminum Foundry, LTD
1350 Halbleib Road

Chippewa Falls, WI 54729

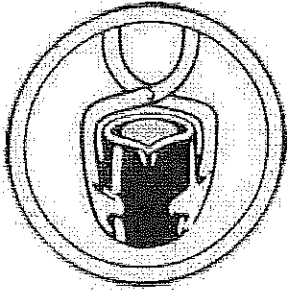
Phone: (715) 723-7049 Fax (715) 723-9303

Email: cbf@chippewafoundry.com

Web site: www.chippewafoundry.com

Waste Analysis Plan (WAP)

Made 2/16/09
Revised 12/03/13



Chippewa Brass & Aluminum Foundry, LTD
1350 Halbleib Road

Chippewa Falls, WI 54729

Phone: (715) 723-7049 Fax (715) 723-9303

Email: cbf@chippewafoundry.com

Web site: www.chippewafoundry.com

General Facility Information

I. Facility Processes, Activities, and Past Analysis

- A. General Operations
- B. Type of Waste
- C. Past Analysis
- D. Identification/EPA Classification and Quantities of Hazardous Wastes
- E. Description of Hazardous Waste Management Units
- F. Labeling

II. Selection Waste Analysis Parameters

- A. Criteria and Rationale for Parameter Selection

III. Selecting Sampling Procedures

- A. Sampling Strategies and Equipment
- B. Sampling Preservation and Storage
- C. Sampling QA/QC Procedures

IV. Selecting a Laboratory, and Laboratory testing and Analytical Methods

- A. Selecting a Laboratory
- B. Selecting Testing and Analytical Methods

V. Selecting Waste Re-Evaluation Frequencies

VI. Special Procedural Requirements

- A. Procedures for Receiving Wastes from Off-site Generators
- B. Procedures for Ignitable, Reactive, and Incompatible Wastes
- C. Procedures to Ensure Compliance with LDR Requirements

Chippewa Brass & Aluminum Foundry,LTD

1350 Halbleib Road
Chippewa Falls, WI 54729

GENERAL FACILITY INFORMATION

Name of Facility: Chippewa Brass & Aluminum Foundry, LTD.

Facility Address: 1350 Halbleib Road Chippewa Falls WI, 54729

Facility Contact: James Melville President

Telephone: (715) 723-7049

Mailing Address: cbf@chippewafoundry.com

Owner: Helen Melville

Operator: James Melville

Standard Industrial classification (SIC) Code: 3366

I. Facility Processes, Activities, and Past Analysis Summery

~~A.~~ A. General Operations

Chippewa Brass & Aluminum Foundry specializes in non-ferrous metal castings. The castings are made using the green sand and airset molding processes. The foundry

specializes in smaller production runs, generally fewer than 1000 pieces per order and most castings weighing less than 100 lb. The foundry occupies 14,000 square feet of production area with a pouring capacity of 5000 pounds of castings per day. The castings are cleaned and processed using band saws, belt sanders, and shot blasters.

B. Type of Waste

Chippewa Brass & Aluminum Foundry LTD. generates waste molding sand, which contains lead (D008). See past analyses for amount of lead and other metals present in sand. The sand is black in color also containing core butts, these are light tan to red/orange color. Chippewa Brass treats the waste sand on site in a 55-gallon drum. Out side of our process no untreated waste sand is stored at Chippewa Brass & Aluminum Foundry LTD.

C. Past Analysis

Past analysis are shown on Lab Results 4-1 and 4-2.

D. Identification/EPA Classification and Quantities of Hazardous Wastes

The identification/EPA classification of hazardous wastes is provided in Table 4-12. Chippewa Brass & Aluminum Foundry LTD. treats leaded foundry sand on site stabilize it to 0.032mg/l to meet LDR (Land Disposal Restrictions) treatment standards.

E. Description Of Hazardous Waste Treatment Process

The following are steps for treating leaded green sand:

1. Estimate one batch of sand 625lbs. on the floor in clean up area.
2. Shovel sand off floor and put in a 55 gal. drum, It can not weigh more than 625lbs., or ratio will not be correct. The sand must be weighed to get correct ratio.
3. 50lbs of Enviro Blend is weighed out in a 5 gallon bucket and added to drum for 8% ratio. This is very important to get the correct ratio of sand and Enviro Blend to bind lead for land filling.
4. A lid is placed on the drum and ring secured with impacted gun so it does not leak.
5. Drum with waste sand and Enviro Blend is placed on barrel roller mixer.
6. Drum is hydraulically lifted on to roller mixer and rolled for 20 minutes.
7. After mixing is complete roller mixer will automatically turn off, and then will need to be tilted down using controls.
8. Drum is then marked treated waste sand and placed in south west corner of building.
9. Treated waste sand can not be stored in the dumpster out doors without a cover to protect it from the weather. Treated waste sand will be stored indoors in 55 gal. drums with lids on.
10. When 15 ton (roll off box) or one year of waste sand is accumulated, it can be land filled.
11. Before land filling, it must be tested for heavy metal and other hazardous substances. (See previous Lad testing)
12. A "SPECIAL WASTE PROFILE SHEET" but be filled out and sent to land fill with lab results prior to land filling. This must approved by land fill also.
13. After land fill approval SPECIAL WASTE PROFILE SHEET, then sand can be sent to land filled.

F. Labeling

All drums of waste sand must be labeled. Before they are treated the drum must be labeled "HAZARDOUS WASTE SAND". For drums such as shot blaster dust under dust collector BH4 and drum collecting dust under dust collector BH5, MUST BE

LABELED "HAZARDOUS WASTE SAND". Once it has been treated, then it must be marked "TREATED WASTE SAND".

II. Selection Waste Analysis Parameters

A. Criteria and Rationale for Parameter Selection

Chippewa Brass & Aluminum Foundry LTD generates foundry sand contaminated with lead, which is hazardous. It must be treated to stabilize and bind, the heavy metal in sand to a safe level for LDR. Because of the concentrations of heavy metals in the waste sand it is a hazard to any one that comes in contact with it (lead can be absorbed into body by ingesting, through skin or inhalation). If land filled without treatment, lead can leach into ground water. As a result an analytical report has been taken before treatment and another after treatment to assure safe LDR (Land Disposal Restriction). Because of testing before and after, proper binding material and mixing equipment has been selected.

Chippewa Brass & Aluminum Foundry LTD. does not store hazardous waste and waste is taken from our process and treated. Analytical Reports for TCLP (Toxicity Characteristic Leaching Procedure) metals have verified our waste to be none hazardous after treating, so land filling is then permitted.

III. Selecting Sampling Procedures

A. Sampling Strategies and Equipment

The first set for sampling is contact Davy Lad. In La Crosse WI. and request a sample test kit for our leaded green sand. After receiving the test kit, a grab samples of untreated sand can be taken at clean up end where castings are knocked out. A sample of treated sand is taken after mixing and treating. This is for a true representation of our waste and treatment process. All samples are sent to certified lab.

B. Sample Preservation and Storage

Davy laboratory of La Crosse WI. have been chosen to do all waste sand analysis. Shipping Instructions are sent with sample kit and must be followed.

C. Sampling QA/QC Procedures

All sampling conducted for the purpose of characterizing wastes generated by Chippewa Brass & Aluminum Foundry Ltd. will use appropriate QA/QC procedures, including chain-of custody procedures from sample collection through delivery to the analytical laboratory. Additionally, Chippewa Brass & Aluminum Foundry LTD. will limit the number of personnel who perform sampling to management or anyone trained by management to ensure the highest levels of consistency and accuracy. Management annual to assure proper sample taking reviews sampling procedure.

IV. Selecting a Laboratory, and Laboratory testing and Analytical Methods

A. Selecting a Laboratory

We have selected Davy Lab. to perform all of the detailed TCLP-Metal analytical report specified in our WAP. In particular, this laboratory has:

1. A comprehensive QA/QC
2. Technical analytical expertise
3. An effective information system.

B. Selecting Testing and Analytical Methods

The selection of analytical testing method for the leaded waste sand generated by Chippewa Brass & Aluminum Foundry LTD was based on the following considerations:

1. RCRA metals (Resource Conservation and Recovery Act)
2. Method left up to lab.
3. DNR specifications

V. Selecting Waste Re-Evaluation Frequencies

In accordance with the requirements of the EPA, waste sand will be tested whenever process changes or periodically.

VI. Special Procedural Requirements

A. Procedures for Receiving Wastes from Off-Site Generators

Since Chippewa Brass & Aluminum Foundry LTD does not receive wastes from off-site generators; no procedures are applicable to the receipt of off-site wastes.

B. Procedures for Ignitable, Reactive, and Incompatible Wastes

All precautions for reactivity and incompatibility were addressed in WAP. There are no additional procedures for managing and treating leaded foundry sand waste.

C. Procedures to Ensure Compliance with LDR Requirements

Since Chippewa Brass & Aluminum Foundry LTD is treating hazardous waste on site regulated under s. NR 668.40 [or 40 CFD 268.40] to meet LDR treatment standards, this WAP serves to document the facility's procedures for complying with the LDR rules. Specifically, Section 1-5 described the procedures for obtaining representative samples of leaded waste sand, both before and after treatment. The results of pre-treatment waste analysis will determine the specific treatment process requirement, the ratio of binder to sand, and the mix time, necessary to appropriately treat leaded waste sand to meet the LDR treatment standards. The results of post-treatment waste analysis will determine whether the hazardous characteristic has been removed.

In addition to the development of a WAP, Chippewa Brass & Aluminum Foundry LTD. will prepare appropriate LDR notifications and certification for Disposal Company. Records of this documentation, including waste testing results, will be maintained for a minimum of five years.

Chippewa Brass & Aluminum Foundry LTD EPA ID: WID988592242 generates waste molding sand, which contains lead (D008). The waste is treated on site then, Advanced Disposal Services 2626 Mondovi RD Eau Claire, WI 547011 is the approved solid waste facility and Advanced ES Seven Mile Creek Landfill, LLC 8001 Olson Drive, Eau Claire, WI 54703, EPA ID:110016925274 accepts our treated waste.

I certify under penalty of law that I have personally examined and I am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I Believe that the treatment process has been operated and maintained properly so as to comply with the treatment standards specified in s. NR 668.40[or40CFR 268.40] without impermissible dilution of the prohibited waste. I am aware there are significant penalties for submitting a false certification, including the imprisonment.

James Melville

President

-- Date



EMERGENCY AVAILABILITY SERVICE AGREEMENT

This agreement made and entered into this 5th day of December, 2013, (hereafter referred to as "Company") and WRR Environmental Services Co., Inc. (hereafter referred to as "WRR").

Whereas WRR, through its RESCO division, is in the business of providing emergency environmental services on an as-called basis, twenty-four (24) hours per day, seven (7) days per week, (365) days per year, for the one (1) year after the date of this Agreement, the parties hereby agree as follows:

1. The Company agrees to pay a sum of \$515.00 non-refundable retainer fee upon execution to secure WRR's services on a priority emergency basis. This fee does not include labor fees, mobilization fees, disposal fees or materials and equipment fees, or any other costs associated with a response. However, upon acceptance of the agreement by guarantees labor rates and equipment fees for a period of one year.
2. When there is work to be performed at the request of the Company, an Environmental Service Agreement work order must be signed by an authorized Company representative in a form acceptable to WRR.
3. When performing services and duties hereunder, WRR and any person acting on WRR's behalf shall do so as independent contractors and are not, and are not to be deemed, employees or agents of the Company or any other person acting on behalf of the Company.

Nor shall WRR be considered to assume any interest as owner or possessor of, generator, transporter, or disposer of any hazardous materials which it is called upon to deal with under this Service Agreement except upon such terms as are expressly agreed to by WRR.

4. WRR shall accept the Company's determination of any particular situation which the Company deems that a hazardous material is present. WRR shall make its own determinations as to the safety precautions and methods appropriate for any such material handling and shall then handle that material as a hazardous waste according to all applicable laws and regulations. Additionally, the Company agrees to follow and abide by all reasonable instructions and directions from WRR to aid or assist in performing services on the Company's behalf under this Agreement.

5. This agreement shall be in effect for one (1) year from the date of execution unless terminated earlier. Either party may terminate this agreement at any time, with or without cause, upon thirty (30) days prior written notice to the other party. If this agreement is terminated by WRR without cause before the end of the one (1) year term, the retainer fee shall be prorated through the effective termination date and the balance, if any, shall be refunded. In addition, if the Agreement is terminated, WRR shall be held harmless by the Company from any and all damages, direct and consequential, which it may suffer should the need arise to have emergency environmental services performed during the remainder of the original term of this Agreement and should it be unable to procure such services, whether through WRR or another provider.

6. If either party hereto shall be delayed or hindered in or prevented from the performance of any act required hereunder by reason of strike, lock outs, labor troubles, inability to procure materials, failure of power, restrictive governmental laws or regulations, riots, insurrection, war, weather or other act of nature, environmental remediation work ordered by any governmental body or voluntarily initiated by the Company, or other reason of a like nature not the fault of the party delayed in performing work or doing such acts required under this Agreement, the delayed party shall not be held responsible for such delay.

7. Each party assumes responsibility for their respective acts and each party shall hold the other harmless for any such liability which occurs as a result of their own negligence or acts.

WRR shall be liable for and hold the Company harmless only for the "work" including labor, materials and transportation provided by WRR with regard to the hazardous material. The Company shall be liable and responsible for all other aspects related to the hazardous material, including all claims from third parties unless such claim is specifically related to the work performed by WRR.

8. Upon execution of this Agreement, WRR shall provide to the Company the name(s) of a contact person(s), telephone number(s) at which they can be reached 24 hours per day, seven days per week, and an address(s) for the purpose of facilitating Company contact with WRR for the provision of emergency environmental services. Furthermore, WRR shall, on an as needed basis, update said listing from time to time during the term of this Agreement.

9. In consideration for services required of WRR hereunder, Company agrees to compensate WRR as listed on the EMERGENCY RESPONSE CHARGES price list. Payment terms are net 30 days. Any bills not paid within thirty (30) days shall accrue interest at a rate of 1% per month on the unpaid principal balance.

10. The parties hereby expressly acknowledge and agree that this Agreement is entered into in the State of Wisconsin and, to the extent permitted by law, this Agreement shall be construed and enforced in accordance with the laws of the State of Wisconsin.

In witness whereof, WRR and Company have each caused this agreement to be executed by a duly authorized representative on the day indicated, the agreement becomes effective upon execution by both parties.

ACCEPTANCE

Company Name: Chippewa Brass &
aluminum Foundry Ltd.
1350 Halbleib Road
Chippewa Falls, WI
54729

By: x [Signature] A. McArthur

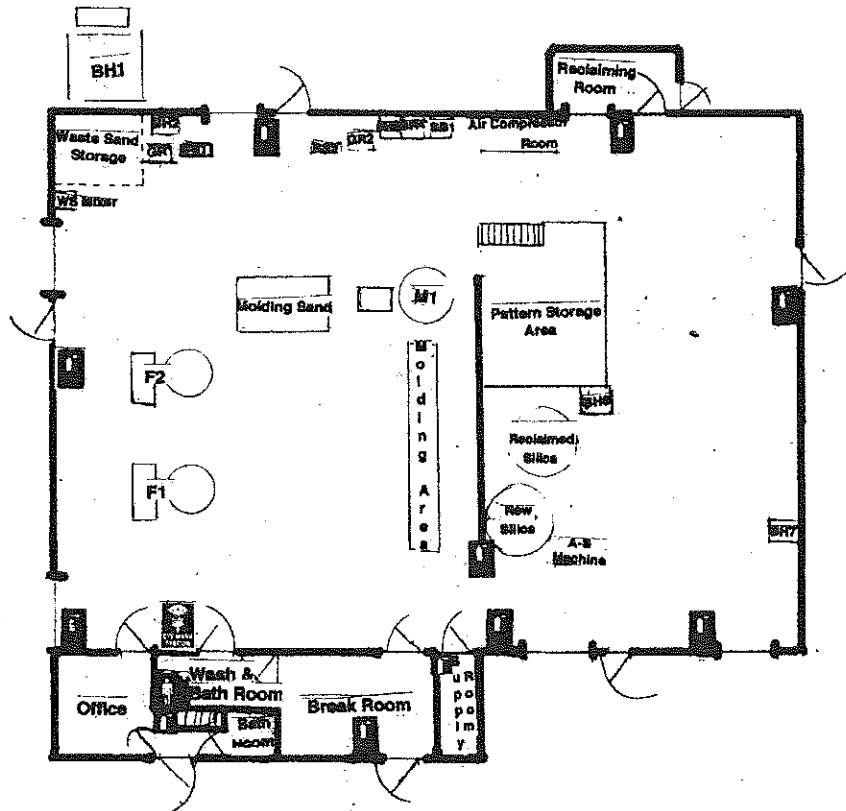
By: _____

WRR Environmental Services Co Inc
5200 Ryder Rd
Eau Claire WI 54701

By: Dean Sabin

By: [Signature]

IN AN EMERGENCY DIAL 911



FIRE EXTINGUISHER SYMBOL/ LOCATION



EYE WASH STATION SYMBOL/ LOCATION



EMERGENCY SHOWER SYMBOL/ LOCATION

